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12 *PROXAMAMA, INC.*

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

15 EMULAIT, INC. f/k/a PROXAMAMA, INC.,

16 Plaintiff,

17 v.

18 ROEMBKE TURNKEY SOLUTIONS, LLC,
19 ROEMBKE MFG. & DESIGN, INC., and
GREGORY J. ROEMBKE,

20 Defendants.
21

Case No. 2:24-CV-02267-APG-NJK

**STIPULATION TO CONTINUE
HEARING ON DEFENDANTS'
MOTION TO CHANGE VENUE OR
TRANSFER [ECF No. 17] AND
MOTION TO DISMISS COMPLAINT
[ECF No. 16]**

(First Request)

22 Pursuant to Local Rules IA 6-1, IA 6-2, and LR 7-1, Plaintiff Emulait, Inc. f/k/a
23 Proxamama, Inc. ("Plaintiff") and Defendants Roembke Turnkey Solutions, LLC, Roembke Mfg.
24 & Design, Inc., and Gregory J. Roembke ("Defendants," together with Plaintiff, the "Parties"),
25 hereby stipulate and agree as follows:

26 IT IS HEREBY STIPULATED AND AGREED as follows:

- 27 1. On January 17, 2025 Defendants filed a Motion to Dismiss Complaint [ECF No.
28

16] and Motion to Change Venue or Transfer [ECF No. 17] (the “Motions”).

2. On April 3, 2025, the Court issued a Minute Order setting a hearing on Defendants’ Motions for April 8, 2025 at 1:30 p.m. in Las Vegas, Courtroom 6C, before Chief Judge Andrew P. Gordon [ECF No. 43].

3. Based on scheduling conflicts, the parties have met and conferred about alternative hearing dates.

4. The Parties agree that good cause exists to continue the hearing and respectfully request that the hearing be continued to April 22, 2025, at 2:30 p.m.

5. This request is not intended to cause delay or prejudice any party.

NOW, THEREFORE, the Parties respectfully request that the Court grant the foregoing Stipulation and enter an Order continuing the hearing to April 22, 2025.

DATED this 7th day of April, 2025.

DATED this 7th day of April, 2025.

FOX ROTHSCHILD LLP

KAEMPFER CROWELL

/s/ Rex D. Garner

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TURNKEY SOLUTIONS, LLC, ROEMBKE
MFG. & DESIGN, INC., and GREGORY J.
ROEMBKE*

IT IS SO ORDERED.


CHIEF UNITED STATES DISTRICT JUDGE

DATED: April 7, 2025